EXHIBIT B

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

ULTRAVISION TECHNOLOGIES, LLC,

Plaintiff,

v.

Case No. 2:18-cv-00100-JRG-RSP LEAD CASE

GOVISION, LLC

Defendant.

ULTRAVISION TECHNOLOGIES, LLC,

Plaintiff,

v.

Case No. 2:18-cv-00112-JRG-RSP MEMBER CASE

SHENZHEN ABSEN OPTOELECTRONIC CO., LTD. ET AL.

Defendants.

DECLARATION OF JAMES LIU

- I, James Liu, hereby declare as follows:
- 1. I have personal knowledge of the facts stated herein or, as indicated below, understand them to be true and correct based on my good faith investigation coordinated with the relevant Shenzhen Absen Optoelectronic Co., Ltd. ("Absen Opto") personnel. I could and would competently testify to these facts if I were required to do so in a court of law. The statements in this declaration are with respect to the time period starting on March 27, 2018 through the date on which this declaration is signed.
- 2. I joined Absen Opto in January of 2010. In June of 2015, I joined Absen Opto's subsidiary Absen, Inc. My current title is General Manager of North America BU, and I have served in that role since January of 2019.

- 3. Absen Opto is a corporation organized and existing under the laws of China.
- 4. Absen Opto's principal place of business located at 18-20F Building 3A, Cloud Park, Bantian, Longgang District, Shenzhen, 518129, P.R. China. Absen Opto develops, manufactures, and sells visual display products.
- 5. Absen Opto wholly-owns a U.S. subsidiary called Absen, Inc. ("Absen Inc."). Absen Inc. is headquartered in Orlando, Florida and is incorporated in Delaware. I was formerly an employee of Absen Opto and am currently an employee of Absen, Inc.
- 6. Absen Opto has no subsidiaries located in Texas. Absen Opto does not regularly conduct or solicit business from, or direct relevant business efforts to, Texas.
- 7. Absen Opto has no offices, officers, directors, employees, agents or other representatives located within Texas.
 - 8. Absen Opto does not perform any research and development in Texas.
 - 9. Absen Opto does not perform any manufacturing in Texas.
 - 10. Absen Opto does not maintain any inventory of products within Texas.
 - 11. Absen Opto does not have any bank accounts within Texas.
- 12. Absen Opto is not registered to do business in Texas, nor has it designated an agent for service of process within Texas.
- 13. Absen Opto does not maintain any assets in Texas. Absen Opto does not own, lease or rent personal or real property in Texas.
 - 14. Absen Opto has not tailored any marketing to Texas or to Texas residents.
- 15. Absen Opto has not used the state or federal court system in Texas, other than being sued by Plaintiff Ultravision Technologies, LLC ("Ultravision") and the limited filings in response. Absen Opto has never filed suit in Texas federal or state court.

16. I understand that on in its Complaint in this case, Ultravision is accusing the Absen

X and Xv series of products of infringement.

17. Absen Opto manufactures the Absen X and Xv series of products in China. Absen

Opto does not make, use or sell products in Texas.

18. Any sales of the Absen X and Xv series of products in the United States are made by

Absen Inc. Absen Opto does not sell products to consumers in the United States other than Absen,

Inc. Absen Opto's only U.S. customer is located in Orlando, FL—Absen Inc. Absen Opto does

not have any role in determining where or to whom Absen Inc. will sell or ship product. Absen

Opto does not sell any products in Texas or direct its subsidiary to target the Eastern District of

Texas market.

I declare under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct.

Executed this 30 day of May, 2019

James Liu

美国地区法院 德克萨斯州东区 马歇尔分区

ULTRAVISION TECHNOLOGIES, LLC,

原告

诉

GOVISION, LLC

被告

ULTRAVISION TECHNOLOGIES, LLC,

原告

诉

SHENZHEN ABSEN OPTOELECTRONIC CO., LTD. 等当事方

被告

案件编号: 2:18-cv-00100-JRG-RSP 主审案件

案件编号: 2:18-cv-00112-JRG-RSP 从审案件

JAMES LIU 的陈述

我, James Liu, 谨在此陈述如下:

- 1. 我直接了解此处陈述的事实,或如下所述基于我的诚实调查知道此等事实真实无误, 我在调查中与 Shenzhen Absen Optoelectronic Co., Ltd. (下称"Absen Opto")有关人员 进行了协调。如果需要我在法院就此等事实作证,我能够也愿意作证。本陈述书中的 各项陈述涵盖的时段从 2018 年 3 月 27 日开始,直至本陈述书的签署日期。
- 2. 我于 2010 年 1 月到 Absen Opto 任职。2015 年 6 月,我到 Absen Opto 的子公司 Absen, Inc. 任职。我目前的职务是北美业务部总经理,我从 2019 年 1 月起一直担任该职务。

- 3. Absen Opto 是根据中国法律成立和运营的公司。
- 4. Absen Opto 的主要业务地址是:中华人民共和国深圳市龙岗区坂田天安云谷产业园 3 栋 A 座 18-20 层,邮编 518129。Absen Opto 研发、制造、销售视觉显示产品。
- 5. Absen Opto 全资拥有一家美国子公司,该公司名为 Absen, Inc. (下称"Absen Inc.")。
 Absen Inc.总部设在佛罗里达州奥兰多市,在特拉华州注册。我以前是 Absen Opto 的员工,现在是 Absen, Inc.的员工。
- 6. Absen Opto 在德克萨斯州没有子公司。Absen Opto 平时不在德克萨斯州经营业务或从 德克萨斯州招徕业务,也不着力于在德克萨斯州开发业务。
- 7. Absen Opto 在德克萨斯州没有办事处、管理人员、董事、雇员、代理人或其他代表。
- 8. Absen Opto 不在德克萨斯州开展任何研发活动。
- 9. Absen Opto 不在德克萨斯州开展任何制造活动。
- 10. Absen Opto 在德克萨斯州没有任何库存产品。
- 11. Absen Opto 在德克萨斯州没有银行账户。
- 12. Absen Opto 没有在德克萨斯州注册经营业务,也没有在德克萨斯州指定代理人收发法院文书。
- 13. Absen Opto 在德克萨斯州没有资产。Absen Opto 在德克萨斯州不拥有动产或不动产, 也没有在德克萨斯州长期或短期租赁动产或不动产。
- 14. Absen Opto 没有针对德克萨斯州或其居民进行营销。
- 15. 除了就原告 Ultravision Technologies, LLC(下称"Ultravision")提出的诉讼提交有限的文件外,Absen Opto 未曾使用设在德克萨斯州的州法院或联邦法院系统。Absen Opto 从未在设在德克萨斯州的州法院或联邦法院主动提出诉讼。

- 16. 我理解,在本案中,Ultravision在其诉状中声称 Absen X 和 Xv 系列的产品侵权。
- 17. Absen Opto 在中国制造 Absen X 和 Xv 系列产品。Absen Opto 不在德克萨斯州制造、使用或销售产品。
- 18. Absen X 和 Xv 系列产品在美国的销售由 Absen Inc.进行。除了 Absen, Inc.之外,Absen Opto 不向美国的消费者出售产品。Absen Opto 的唯一美国客户 Absen Inc.位于佛罗里达州奥兰多市。Absen Opto 对 Absen Inc.将在何处或向谁销售或运送产品方面不起任何作用。Absen Opto 不在德克萨斯州销售任何产品,也不会指示其子公司以德克萨斯州东区市场为目标。

我保证以上陈述真实准确,如有不实甘愿根据美国法律受作伪证之处罚。

2019年5月 30 日签署



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Certificate of Accuracy

May 30, 2019

I, Blanche Xueru Cheng, Translator at Performance Language Solutions, hereby certify that I translated the attached document from English into Chinese and that, to the best of my knowledge, it is a true and accurate translation.

I further certify that I am fluent in English and Chinese and qualified to translate this document.

The document is designated as:

• Declaration of James Liu

Signature of Blanche Xueru Cheng